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UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD

VERIZON WIRELESS, )  
 )  
Respondent, )  
 )  
and )  
 )  
COMMUNICATIONS WORKERS OF AMERICA, )  
AFL-CIO, )  
 )  
Charging Party. )  
\_\_\_\_\_ )

Case 02-CA-157403

VERIZON NEW YORK INC., EMPIRE  
CITY SUBWAY COMPANY (LIMITED),  
VERIZON AVENUE CORP., VERIZON  
ADVANCED DATA INC., VERIZON  
CORPORATE SERVICES CORP.,  
VERIZON NEW ENGLAND INC.,  
VERIZON SERVICES CORP. AND  
VERIZON NEW JERSEY INC.,

Respondents,

and

COMMUNICATIONS WORKERS OF  
AMERICA (“CWA”),

Charging Party.

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VERIZON PENNSYLVANIA INC.,  
VERIZON SERVICES CORP. AND  
VERIZON CORPORATE SERVICES  
CORP.,

Respondents,

and

COMMUNICATIONS WORKERS OF  
AMERICA, DISTRICT 2-13, AFL-CIO,  
CLC,

Charging Party,

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VERIZON WASHINGTON, D.C. INC.,  
VERIZON MARYLAND INC., VERIZON  
VIRGINIA INC., VERIZON SERVICES  
CORP., VERIZON ADVANCED DATA INC.,  
VERIZON SOUTH INC. (VIRGINIA),  
VERIZON CORPORATE SERVICES CORP.  
AND VERIZON DELAWARE INC.,

Respondents,

and

COMMUNICATIONS WORKERS OF  
AMERICA, DISTRICT 2-13, AFL-CIO  
CLC,

Charging Party,

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Case 02-CA-156761

Case 04-CA-156043

Case 05-CA-156053

VERIZON CALIFORNIA, INC. AND )  
VERIZON FEDERAL INC., VERIZON )  
FLORIDA INC., VERIZON NORTH LLC, )  
VERIZON SOUTHWEST INC., VERIZON )  
CONNECTED SOLUTIONS INC., VERIZON )  
SELECT SERVICES INC. AND MCI )  
INTERNATIONAL, INC., )  
)  
)  
Respondents, )  
)  
and )  
)  
COMMUNICATIONS WORKERS OF )  
AMERICA AFL-CIO, DISTRICT 9, )  
)  
Charging Party. )  
\_\_\_\_\_ )

Case 31-CA-161472

**MOTION TO STRIKE VERIZON WIRELESS' AND VERIZON WIRELINE ENTITIES'  
REPLY TO CHARGING PARTIES' RESPONSE TO NOTICE TO SHOW CAUSE**

The Board issued a Notice to Show Cause in this case on November 19, 2018. An extension was granted to the parties and only the Respondents and the Charging Party filed a response.

Nonetheless, the Verizon Wireless and Verizon Wireline Entities filed a "Reply to the Charging Parties' Response to Notice to Show Cause" on January 8, 2019.

The Board's Notice to Show Cause did not suggest that any replies or responses could be filed, other than to the Notice to Show Cause. The Board's Rules don't provide for additional replies or responses. The Board has only allowed such replies when the rules expressly allow them or the Board expressly allowed them in orders.

The Board should strike the "Reply to the Charging Parties' Response to Notice to Show Cause" or, in the alternative, allow the Charging Parties to file their own Response.

The Board has to clarify its procedural Rules when issuing these Notice to Show Cause, but failed to do so in this case, giving Verizon Wireless and Verizon Wireline Entities the opportunity to file additional responses, when none were contemplated or permitted by the original Notice to Show Cause.

Dated: January 17, 2019

Respectfully submitted,

AMY YOUNG

LAURENCE GOODMAN  
WILLIG, WILLIAMS & DAVIDSON

WEINBERG, ROGER & ROSENFELD  
A Professional Corporation

By: /s/ David A. Rosenfeld  
DAVID A. ROSENFELD  
Attorneys for the Charging Parties

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## **PROOF OF SERVICE**

I am a citizen of the United States and resident of the State of California. I am employed in the County of Alameda, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of eighteen years and not a party to the within action.

On January 17, 2019, served the following documents in the manner described below:

### **MOTION TO STRIKE VERIZON WIRELESS' AND VERIZON WIRELINE ENTITIES' REPLY TO CHARGING PARTIES' RESPONSE TO NOTICE TO SHOW CAUSE**

- ☒ (BY ELECTRONIC SERVICE) By electronically mailing a true and correct copy through Weinberg, Roger & Rosenfeld's electronic mail system from [kkempler@unioncounsel.net](mailto:kkempler@unioncounsel.net) to the email addresses set forth below.

On the following part(ies) in this action:

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 17, 2019, at Alameda, California.

*/s/ Karen Kempler*  
\_\_\_\_\_  
Karen Kempler